

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
BECKLEY DIVISION**

UNITED STATES OF AMERICA

v.

DONALD L. BLANKENSHIP

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Criminal No. 5:14-cr-00244

MOTION FOR PERMISSION TO TRAVEL HOME OVER MEMORIAL DAY

Donald L. Blankenship, through counsel, hereby moves the Court for an order permitting him to travel home to Nevada during the Memorial Day holiday, from May 23, 2015 through May 30, 2015, to attend to personal matters. In support of the motion, Mr. Blankenship states as follows:

1. At the conclusion of his bond hearing and arraignment on the original indictment, held on November 20, 2014, Mr. Blankenship was ordered released subject to certain conditions set forth in the Order Setting Conditions of Release (ECF No. 15). During the six months that have passed since his bond hearing, Mr. Blankenship has remained in full compliance with the conditions of his pretrial release.

2. The Order Setting Conditions of Release permits Mr. Blankenship to travel outside of the Southern District of West Virginia and Pike County, Kentucky “as pre-approved by the Court.” ECF No. 15 ¶ 7(f).

3. On November 22, 2014, the Court granted Mr. Blankenship permission to travel home to Nevada for the Thanksgiving holiday. Mr. Blankenship thereafter voluntarily remained in the District pending resolution of the government’s appeal of that ruling. After the appeal was decided in his favor, Mr. Blankenship traveled home to Nevada, remained in compliance with his

pretrial release conditions at all times, and returned to this District on schedule and without incident. Mr. Blankenship has not been home since Thanksgiving.

4. Mr. Blankenship respectfully requests permission to travel home to Nevada during the Memorial Day holiday, from May 23, 2015 through May 30, 2015, to attend to personal matters, including to visit a dentist and to meet with attorneys located there.

5. As demonstrated by Mr. Blankenship's prior travel home nearly six months ago, by the extensive pretrial release conditions to which he is subject, and by his full compliance with those conditions over the past six months, a brief trip home to attend to personal matters poses no risk of non-appearance and no risk of danger to the safety of any person or the community.

WHEREFORE, Mr. Blankenship respectfully requests permission to travel home to Nevada from May 23, 2015 through May 30, 2015.

Dated: May 6, 2015

Respectfully submitted,

/s/ William W. Taylor, III

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been electronically filed and service has been made
by virtue of such electronic filing this 6th day of May 2015 on:

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